# Response pertaining to EPCRA § 313 to FOIA Request: EPA-R6-2022-005350

Mort Wakeland, July 23, 2022

All information requested under this FOIA can be obtained from EPA's Website **Envirofacts**: <a href="https://enviro.epa.gov/">https://enviro.epa.gov/</a>

#### INSTRUCTIONS TO RETRIEVE REQUESTED INFORMATION

Copy the TRIFID (Toxic Release Inventory Facility Identification Number): 76137MTRLN5555N for searching the various reports under Envirofacts/TRI.

On the Envirofacts Homepage, in the far-right column under TRI,

1) Click **TRI Search** to find information about the facility that reported to TRI.



On the search screen under **Facility Selection** be sure to change the method of search from **Facility Name** to **TRI Facility ID** by clicking down arrow. Can leave the search clarification as **Beginning With**.



Once changed, then paste in the TRIFID:

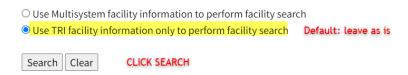
If you forget to change the **Facility Name** to **TRI Facility ID** with the inserted **TRIFID,** you'll end up with zero information!

## **Facility Selection**



Scroll to the bottom of this search section and click **Search**.

## **Search Values**



The next screen will show the facility with the designated TRIFID that you entered. Notice the last reports were for calendar year 2021. To see additional information and additional search options for this facility click **TRI Report** on far left.



2) To download copies of the Form R reports for specific chemicals and specific calendar years (reporting years – RYs) click number 2: **Form R & A Download**. Follow directions to download.



### Regarding where the reported releases came from.

TRI does not capture specific locations where releases occurred. However, TRI does capture if air releases are attributed to stack or point source, or to fugitive emissions.

In addition, Form R will indicate if the releases were to land, water, underground injection, other locations, or to POTWs.

Remember, all information on Form R are in units of pounds. Furthermore, the reported information is accumulated over an entire year's time period. Facilities have from Jan  $1^{\rm st}$  to July  $1^{\rm st}$  to report for the entire previous years usage of TRI chemicals if all requirements are met.

Also please remember specific criteria are required for a facility to report amounts released and waste managed to EPA under 42 U.S.C. § 11023. These are yearly requirements and all 3 must be met; otherwise, the facility does not have to report to TRI.

Reporting is by chemical, by RY if all 3 of the below criteria are met.

- 1. the facility has more than 10 full-time employees or the equivalent of 20,000 hours worked among all full-time, part-time, and contract employees. This include off-site personnel as long as they contribute to the economics of the facility;
- 2. the facility has a <u>primary</u> NAICS (North American Industry Classification System) code covered in the regulations (40 C.F.R. § 372.23); and
- 3. over the entire RY the facility *manufactured, processed, or otherwise used* (*activities*) a TRI chemical above its respective threshold.

Thresholds vary depending on the classification of the TRI chemical: normal TRI chemicals, PBT TRI chemicals, or PFAS TRI chemicals.

Review the Basic Reporting Slides within the TRI Homepage to gain a better understanding of TRI Reporting:

https://ordspub.epa.gov/ords/guideme\_ext/f?p=guideme:gd-list#cr\_sr\_training